

**IN THE UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF MISSOURI**

**In re: DONALD KEITH JOHNSON
NANCY ELIZABETH CHAMBERS**

Case No.: 11-44920-drd-13

Debtors

MOTION TO AMEND PLAN

Comes now Richard V. Fink, Chapter 13 Trustee, and moves to amend the debtor's plan and in support thereof states:

The debtors filed their chapter 13 petition on October 21, 2011.

The current confirmed plan provides for a BASE of 55 months of plan payments.

On or about March 20, 2012 the debtors remitted \$1,050.00 in addition to their monthly plan payment.

Said additional payment represents 2011 tax refunds.

The trustee requests that the plan be amended pursuant to 11 U.S.C. § 1329(a) to allow the trustee to increase the base by the amount of the additional payments (\$1,050.00).

Wherefore, the Chapter 13 Trustee moves the Court for an Order Amending the Debtor's Plan pursuant to 11 U.S.C. Section 1329(a).

March 20, 2012

Respectfully submitted,

/s/ Richard V. Fink, Trustee
Richard V. Fink, Trustee
818 Grand Blvd., Ste. 800
Kansas City, MO 64106-1901

NOTICE OF MOTION

**IF YOU AGREE WITH THE TRUSTEE'S MOTION TO AMEND PLAN, PLEASE DO NOT FILE A RESPONSE TO
THE MOTION OR AN AMENDED PLAN TO REFLECT THE SAME TREATMENT**

Any response to the motion must be filed within twenty-one (21) days of the date of this notice (subject to an extension pursuant to Federal Rule of Bankruptcy Procedure 9006) with the Clerk of the United States Bankruptcy Court. Documents can be filed electronically at <http://ecf.mowb.uscourts.gov>. A copy of such response shall be served electronically by the Court on the Chapter 13 Trustee and all other parties to the case who have registered for electronic filing. If debtor's counsel is not registered for electronic filing, you must serve the response by mail. If a response is timely filed, the Court will either rule the matter based on the pleadings, or set the matter for a hearing. If a hearing is to be held, notice of such hearing will be sent to all parties in interest. **If no response is filed within twenty-one (21) days (subject to an extension pursuant to Federal Rule of Bankruptcy Procedure 9006), the Court will enter an Order confirming the amended plan.** For information about electronic filing, go to <http://www.mow.uscourts.gov>. If you have any questions about this document, contact your attorney.

NOTICE OF SERVICE

Appropriate parties will be served by the Chapter 13 Trustee's office either electronically or by mail.

/s/ Richard V. Fink, Trustee